



August 11, 2022

VIA ECF

Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square Room 430
New York, NY 1000

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.* 22 Civ 2435 (AT)

Dear Judge Netburn:

We are attorneys for Plaintiff Lynne Freeman (“Plaintiff”) in the above-referenced action and are submitting this letter motion requesting a one-week extension of time to respond to certain discovery. On July 15, 2022, we were served with the following discovery:

1. Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Universal City Studios LLC, Entangled Publishing, LLC and Holtzbrinck Publishers, LLC d/b/a Macmillan’s First set of Requests for Production of Documents consisting of 124 document requests;
2. Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Universal City Studios LLC, Entangled Publishing, LLC and Holtzbrinck Publishers, LLC d/b/a Macmillan’s First Set of Interrogatories consisting of 14 Interrogatories.
3. Defendants Prospect Agency, LLC and Emily Sylvan Kim’s First Set of Requests for Production of Documents consisting of 26 document requests; and
4. Defendants Prospect Agency, LLC and Emily Sylvan Kim’s First set of Interrogatories consisting of 17 interrogatories. All of the above discovery

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shall be referred to collectively hereinafter as “Defendants’ Discovery Requests.”

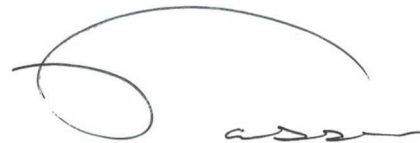
The following is the information required by Rule I. G. of your Individual Practices in a Civil Case: (1) Plaintiff requires an additional one-week extension to respond to Defendants’ Discovery Requests from August 15 to and including August 22, 2022; (2) This is Plaintiff’s first request for an adjournment or extension in the case; (3) Not applicable; (4) CeCe Cole on behalf of Defendants Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan and Universal City Studios LLC, and Zach Press on behalf of Defendants Prospect Agency LLC and Emily Sylvan Kim, both sent me an email stating that they do not oppose the request for a one-week extension of time to respond to the discovery. The e-mail containing both of the foregoing e-mails is enclosed herewith.

Although I have local counsel, I basically do all of the work on this case for Plaintiff myself. I require an additional week to prepare the responses to the discovery. As mentioned above, one of the sets of document requests alone contains 124 requests. Accordingly, we respectfully request a one-week extension from August 15 to August 22, 2022, to respond to Defendants’ Discovery Requests.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

CSReeder, PC



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